

Department of Public Health
and Human Services

Section:
CASE MANAGEMENT

TANF CASH ASSISTANCE

Subject:
WoRC Participation, Documentation &
Reconciliation

Supersedes: TANF 701-4 (07/01/07); TB-34 (6/25/07); TB-38 (9/13/07)

References: 45 CFR 261.20-.25; ARM 37.78.102; and .508; Deficit Reduction Act of 2005;

GENERAL RULE -- States must report the actual number of participation hours for each work activity in which an adult (or minor child head of household) participated. The state must report actual participation hours for each benefit month rather than the hours negotiated to ensure "accurate and complete" information is reported in the TANF file. Refer to TEAMS User Guide, 700-p.2, for TEAMS procedures.

NOTE: A state's participation rate is calculated on the participation status of each individual required to participate and is NOT averaged out over the entire caseload.

Reconciliation Processes: Effective October 1, 2006, TEAMS will support the following reconciliation processes and will identify which reconciliation method is used for each employability plan.

- a. **Manual Reconciliation:** The manual reconciliation process will enable the WoRC Case Manager to manually reconcile an employability plan when the participant has participated in activities not previously negotiated, or when the participant's actual hours completed for a component are not equal to the negotiated hours.
- b. **Auto-Reconciliation:** The auto-reconciliation process will allow the WoRC Case Manager to indicate the participant has completed his/her employability plan requirements exactly as negotiated. When a 'Y' is placed in the ACTIVITIES COMPLETED column on PARE, TEAMS will automatically reconcile all negotiated activities.
- c. **System Reconciliation:** System reconciliation is the monthly process that will automatically reconcile hours associated with the NEW and HNC component codes.

The system reconciliation process to reconcile the NEW and HNC components will run at the end of the benefit month and display on TEAMS the beginning of the reconciliation month. For example, TEAMS will automatically reconcile the NEW and HNC components for the benefit month of April in the system reconciliation process run at the end of April, displaying in May.

► **HNC**

The HNC component is available for use during manual reconciliation

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and can be added by a WoRC Case Manager on the Employability Reconciliation screen (EMPR) provided it is being entered for the first two (2) months of benefits. (TANF 701-4)

Hours attributed to the HNC code on EMPL will display on EMPR and can be updated on EMPR as long as the hours edits are met.

**RECONCILIATION
OF ACTIVITIES**

The reconciliation process is focused on specific activities/hours and is necessary to meet federal reporting requirements. During the reconciliation process, the WoRC Case Manager should use the appropriate component codes to indicate the actual activities the participant was engaged in during the month, even if they differ from what was negotiated.

The WoRC Case Manager can use the NPI, NCC, NIH or EBI component codes during reconciliation, if they have been approved by the WoRC Monitor or Central Office.

Example: Joe has negotiated 4 weeks of Job Search (JBS) on his EP for November. On November 29th he contacts his WoRC Case Manager to report he was involved in an accident on November 18th and is in the hospital indefinitely. He provides medical documentation supporting his temporary incapacity.

The WoRC Case Manager will reconcile the first 2 weeks of November using JBS based on actual documentation of Joe's job search activities. The WoRC Case Manager will request approval of the NPI code from the WoRC Monitor and if approved, will reconcile the last 2 weeks of November using NPI.

**► PROSPECTED
EMPLOYMENT
VERIFICATION**

If a TANF case is closing (verified by notice of closure from the OPA) and the participant has failed to provide pay stubs or other documentation verifying employment hours for participation purposes, the WoRC program may reconcile hours of employment as follows:

The OPA must have a signed statement or employment verification form from the employer indicating the following:

1. The start date of employment;
2. The anticipated hours of employment; and
3. The hourly wage.

WoRC must obtain a copy of the signed statement or employment

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verification form for the WoRC case file.

If the above criteria are met, the prospected hours of employment may be used as reconciled hours of employment using the following guidelines:

1. The hours may only be reconciled from the start date of employment; and
2. The reconciled hours may not exceed the “anticipated” hours as stated on the employer statement or form.

► **Example:**

Joe reports to the OPA on 10/10/07 that he has gained employment at Rock Hand Hardware. He is given an employment verification form, which he returns to the OPA on 10/15/07. The employment verification form indicates that Joe will begin work on 10/22/07. He will be scheduled to work 35 hours per week (Mon-Fri 7 hours per day) at \$8.00 per hour. His TANF case closes effective 10/31/07 due to income.

Joe contacts his WoRC Case Manager and reports the job. He renegotiates his EP to be EMP for 35 hours per week effective 10/22/07. The WoRC Case Manager reminds Joe that he will need to provide pay stubs and/or time sheets to verify the employment hours, but Joe does not provide the information.

If the WoRC Case Manager had obtained a copy of the signed employment verification form, they would reconcile EMPR for October as follows:

CMP	START	END	NEG	REC
EMP	10/22/07	10/28/07	035	035
EMP	10/29/07	10/31/07	021	021

All other activities for October would be reconciled based on the **actual** verified hours of participation.



NOTE: If the employer statement was not provided until 10/22 and case was not closed until 11/30/07, employer statement could be used to reconcile November EMPR.

Example:

Susie reports to OPA on 10/25/07 that she was hired at Big Sky Care Center on 10/22/07. She provides a signed statement from the employer which indicates that Susie will begin work on 10/29/07 and is scheduled to work 40 hours per week, Friday – Tuesday 8 hours per day. Susie’s TANF case will close effective 11/30/07 due to income.

Susie meets with her WoRC Case Manager and renegotiates her EP for the last week of October and November. The renegotiated EP is as

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follows:

EMP	10/29/07	10/30/07	016
EMP	11/01/07	11/30/07	160

The WoRC Case Manager reminds Susie that she will need to provide pay stubs and/or time sheets to verify the employment hours, but Susie does not provide the information. If the WoRC Case Manager has obtained a copy of the signed employment statement, they would reconcile EMPR for October as follows:

CMP	START	END	NEG	REC
EMP	10/29/07	10/30/07	016	016

All other activities for October would be reconciled based on the actual verified hours of participation.

The WoRC Case Manager would reconcile EMPR for November as follows:

CMP	START	END	NEG	REC
EMP	11/01/07	11/30/07	160	160

INCARCERATED INDIVIDUALS

Individuals who are incarcerated for less than one week (typically 2-3 days) must be offered the opportunity to “make up” the hours of participation that they were unable to complete due to the incarceration.

If the individual is able to complete the hours and provide verification of the hours and activities, the EMPR screen will reflect the activities and no sanction will be recommended. If the individual does not complete the hours and provide verification, a sanction should be recommended.

Individuals who are incarcerated for more than one week will not be able to “make up” the hours of participation they are unable to complete due to the incarceration. Therefore, a sanction for non-compliance with allowable work activities should be recommended.

NOTE: Even though some jails offer internet access, etc., which may allow the individual to complete job search, etc., activities performed while incarcerated are not allowable work activities. (TANF 701-3)

If the individual who is incarcerated will not be returning to the household before the next month’s benefits are issued, they are not considered

temporarily absent and will be removed from the household for the next month. (TANF 302-1)

► EXCUSED ABSENCES

All TANF participants involved in unpaid allowable work activities are allowed up to 10 excused absence days in a 12-month period. The 12-month period will begin with the first month of TANF benefits received following application and extend 12 months forward.

- **Example:** Joe applies for TANF on 1/27/08 but asks that TANF begin on 2/1/08. The first month in the 12-month period is 02/08.
- **NOTE:** If a TANF participant has a break in receipt of TANF cash assistance for any reason, for at least one month, a new 12-month period begins.
- **Example:** Joe applies for and receives TANF from 02/01/08 through 06/30/08. TANF closes effective 6/30/08. During the time period from 02/01/08—06/30/08 Joe uses 8 of his excused absences. On 9/18/08 he reapplies for TANF and is eligible effective 9/18/08. A new 12-month period begins effective 09/08 and would continue forward for 12 months.
- Use of these excused absence days is limited as follows:
 1. The participant must have good cause, as defined in TANF 1509-1, for not participating;
 2. The participant may not use more than two (2) excused absences in one month;
 3. The participant may not exceed 10 excused absences in any 12-month period; and
 4. The use of the excused absence days is limited to unpaid allowable work activities.
- The WoRC Case Manager must manually track the use of excused absence days in the case file.

► EXCUSED ABSENCE RECONCILIATION

If a participant meets the above criteria for an excused absence, eight (8) hours should be reconciled toward the specific activity/component, in addition to all other actual, verified participation hours. This may result in full hours being reconciled on TEAMS.

- **NOTE:** If the activity/component is a secondary activity, it is limited to five (5) hours in a 2-parent household.

A case note must be entered regarding the use of the excused absence.



Example: John is scheduled to participate in a WEX placement for 33 hours per week in April. He is absent from the WEX site one day due to illness. He completes full WEX participation the rest of the week (25 hours) as verified by the WEX site supervisor. The WoRC Case Manager verifies that Joe has an excused absence day available, and has good cause for missing the activity. The WoRC Case Manager would reconcile a full 33 hours of WEX on EMPR for the week.

► **GOOD CAUSE/
NO EXCUSED
ABSENCE**

If a participant has good cause for not participating, but does not have an excused absence day available, the activity/component would be reconciled only with actual, verified participation hours on EMPR. A sanction would not be recommended however, as good cause exists.

Example: Same scenario as above. John is scheduled to participate in WEX placement for 33 hours per week in April. He is absent from the WEX site one day due to illness. He completes full WEX participation the rest of the week (25 hours) as verified by the WEX site supervisor. The WoRC Case Manager verifies that Joe has already used two (2) excused absences in April. The WoRC Case Manager would reconcile the actual 25 hours of participation on EMPE for the week. A sanction would **NOT** be recommended as Joe has good cause for non-participation.

► **HOLIDAYS**

All TANF participants involved in unpaid allowable work activities are allowed no more than 10 holidays in any Federal Fiscal year (October 1 – September 30). The State has designated the following holidays as allowable holidays, no other holidays are allowed:

Columbus Day
Veteran's Day
Thanksgiving
Christmas
New Year's Day

Martin Luther King, Jr. Day
President's Day
Memorial Day
4th of July
Labor Day



NOTE: Because of the limitation on the holidays to 10 within any Federal Fiscal year, the "count" of holidays does not start over if there is a break in TANF assistance.



Use of the 10 holidays is limited as follows:

1. The use of the holiday day is limited to unpaid allowable work activities;



NOTE: If the participant is involved in employment, the place of employment is closed for the holiday, but the participant is not paid for the holiday, there is no leave day allowed for the holiday. The participant must make up the lost hours in another activity or throughout the month.

2. The participant must have been scheduled to participate in the unpaid allowable work activity; and
3. The holiday must be included in the list of allowable holidays above.



The WoRC Case Manager must manually track the use of holidays in the case file.

► HOLIDAY RECONCILIATION

If a participant meets the above criteria for holiday, eight (8) hours should be reconciled toward the specific activity/component, in addition to all other actual, verified participation hours. This may result in full hours being reconciled on TEAMS.



NOTE: If the activity/component is a secondary activity, it is limited to five (5) hours in a 2-parent household.



A case note must be entered regarding the use of the holiday.

Example: Susie is scheduled to participate in a WEX placement at Rocky Mountain Federal Credit Union for 33 hours per week in October. The credit union is closed on Columbus Day. Susie does not make up the hours missed that day, but does complete full WEX participation the rest of the week as verified by the WEX site supervisor. The WoRC Case Manager verifies that Columbus Day is one of the allowed holidays. The WoRC Case Manager would reconcile a full 33 hours of WEX on EMPR for the week.

Example: John is employed part-time at McDonald's. He is scheduled to work 20 hours per week and has negotiated the employment of 20 hours as an allowable activity on his EP. He is also scheduled to complete 20 hours a week at a WEX site at Good Samaritan. McDonald's is closed on Christmas and John is not given additional shifts that week. He only works 16 hours that week, as verified by pay stubs. John is not paid for the

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holiday. The WoRC Case Manager would reconcile 16 hours of EMP on EMPR for the week and attempt to reconcile another primary activity for the additional hours. John may make up the additional hours throughout the month.

Good Samaritan is also closed on Christmas. John completes the remaining hours of WEX during the week. Because John meets the criteria for a holiday absence, in this activity, the WoRC Case Manager would reconcile 20 hours of WEX on EMPR for the week.

Example: John is employed part-time at McDonald's. He is scheduled to work 20 hours per week and has negotiated the employment of 20 hours as an allowable activity on his EP. He is also scheduled to complete 20 hours a week of self-directed job search.

John verifies that he completed 12 hours of self-directed job search in the week. He is given a holiday absence for Christmas of eight (8) hours. The WoRC Case Manager would reconcile 20 hours of JBS on EMPR for the week.

McDonald's is closed on Christmas and John is not given additional shifts that week. He only works 16 hours that week, as verified by pay stubs. John is not paid for the holiday. The WoRC Case Manager would reconcile 16 hours of EMP on EMPR for the week and attempt to reconcile another primary activity for the additional hours. John may make up the additional hours throughout the month; if not, he is out of compliance and may be sanctioned.

DOCUMENTATION/ VERIFICATION OF ACTIVITIES

Documentation/verification of all activities completed by the participant and reported in the TANF File must be maintained in the WoRC case files. The types of documentation and verification may vary, depending on the activity the participant is engaged in. For more information, please refer to the WoRC Guidelines.

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